



Dilip Jana <janadilip@gmail.com>

Joint Conference Report [Jana v Walmart]: FINAL Version

1 message

Dilip Jana <janadilip@gmail.com>

Fri, Apr 11, 2025 at 3:27 PM

To: Morgan.Jones@gtlaw.com

Cc: Holmes.Hampton@gtlaw.com, Peter.Wahby@gtlaw.com

Bcc: Dilip Jana <janadilip@gmail.com>

Dear Counsels:

I did not receive any communication from you; I have attached the updated version, EXHIBIT A and EXHIBIT B. May I get your consent to file at the Court?

Once I receive your response, I need to sign and file it physically at the Court. Please respond by 4 pm.

If I do not receive any response by 4 pm I have to submit the Conference Report separately, keeping all the materials we agreed upon in addition to my materials, and I'll remove your signature.

Please let me know if you have any questions.

Kind regards,

Dr. Dilip Jana

800 Fairlawn St

Allen, TX, 75002

On Fri, Apr 11, 2025 at 10:19 AM Dilip Jana <janadilip@gmail.com> wrote:

Good morning Peter.

You and I had a phone conversation during Rule 26f conference, can you please respond to this email?

>>The summary of the Rule 26 Conference is not necessary or required, so we removed it.

In my previous email I clearly said,

- *I feel it is necessary to provide a Meeting Summary to avoid misconstrued or taken out of context material, I added a summary, please feel free to add/modify as you feel appropriate*

I added "Summary of the Rule 26 Conference" for a reason when I saw mis-representation was happening on this report as well as your Motion for Protective Order. During the call you preferred, the Plaintiff does not record this call. You said you are officer of the court and you will only state accurate information and recording could be misconstrued or taken out of context. But this is not the case here.

Since I am raising concern of your mis-representation, and since you are the one who did not want to be recorded, you should respect my concern and keep "Summary of the Rule 26 Conference" to give the raw materials to the Court. Let the Court have an opportunity to look at the discussion.

If you disagree, please explain how keeping "Summary of the Rule 26 Conference" is prejudice to you.

Kind regards,

Dr. Dilip Jana

800 Fairlawn St
Allen, TX, 75002

On Fri, Apr 11, 2025 at 9:52 AM <Morgan.Jones@gtlaw.com> wrote:

Thank you, Dilip. We will add your synopsis to the Report as soon as it is received. We made a few additions/changes to the Report as well. See attached containing both your and Walmart's redlines.

Do you have an alternative proposal for the default format for document production if you do not agree to PDF format?

The summary of the Rule 26 Conference is not necessary or required, so we removed it.

Morgan Jones
Associate

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From: Dilip Jana <janadilip@gmail.com>
Sent: Thursday, April 10, 2025 9:20 AM
To: Jones, Morgan (Assoc-DAL-LT) <Morgan.Jones@gtlaw.com>
Cc: Wahby, Peter (Shld-Dal-LT) <Peter.Wahby@gtlaw.com>; Hampton, Holmes (Assoc-DAL-LT) <Holmes.Hampton@gtlaw.com>
Subject: Re: Joint Conference Report [Jana v Walmart]

EXTERNAL TO GT

Dear Counsels:

Thank you for taking a lead on this, I truly appreciate it. I am extremely busy with my mortgage foreclosure situation as I have to make a few decisions within a very short period of time.

I have attached two files, one with the Original, the other with _v1 which I modified, it has tracking information as well. I still have to work on Plaintiff's synopsis which I'll work on later tonight.

Key points to note:

- I crossed out "The Parties agree that PDF format will be the default format for production of all documents unless native format is requested, at which time the Parties will either agree to production in that format or address the issue with the Court."

as we did not discuss this issue during the Conference.

- *I feel it is necessary to provide a Meeting Summary to avoid misconstrued or taken out of context material, I added a summary, please feel free to add/modify as you feel appropriate*
- *Since I am not an attorney, I can't sign by /s/!! I have to sign it. Once I send you Plaintiff's synopsis later today, if you can send me the updated version sometime tomorrow noon, I can then file.*

Please let me know if you have any questions.

Kind regards,

Dr. Dilip Jana

800 Fairlawn St

Allen, TX, 75002

On Tue, Apr 8, 2025 at 7:27 PM <Morgan.Jones@gtlaw.com> wrote:

Dilip: Attached is the draft Joint Rule 26(f) Conference Report we prepared. Please track any changes you propose. As a reminder, this is due for filing on Friday.

Morgan Jones

Associate

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Thanks
Dilip

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Thanks
Dilip

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Thanks
Dilip

3 attachments

 **Exhibit A.pdf**
115K

 **Exhibit B.pdf**
298K

 **Joint Rule 26(f) Conference Report [Jana v Walmart]_final.docx**
47K